

Ryan E. Simpson (11300)
Attorney for Debtors
8839 South Redwood Road, Suite C2
West Jordan, Utah 84088
Telephone: (801) 432-8682
Fax: (888) 247-2541

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH

IN RE: Joseph E Gubler Sherrie Gubler Debtor.	Chapter 13 Case No.: 15T-21889 Judge: William T. Thurman Trustee: Kevin R. Anderson
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MOTION FOR COURT APPROVAL TO SELL PROPERTY OF THE ESTATE

The Debtor, by and through attorney Ryan E. Simpson, moves the Court for an Order allowing the sale of certain real property of the estate. In support of their position, debtor offers the following:

1. On March 6, 2015, debtor filed a Chapter 13 petition in bankruptcy. The plan has not been confirmed.
2. The property located at 146 N. 300 W., La Verkin, Utah 84745, is proposed to be sold Tom Tueller for the purchase price of \$122,000.00
3. Relief from stay has not been filed on the property and Debtor is selling the home to avoid foreclosure.
4. The sale commonly referred to as a "Short Sale" because the purchase price is less than that of the amount owed. The proceeds will be paid as follows:
 - a. To pay off the first mortgage in the approximate amount of \$107,736.15.
 - b. To pay off the second mortgage in the approximate amount of \$4,408.00.
 - c. To pay settlement charges in the approximate amount of \$8,803.00.
 - d. To pay the title insurance in the approximate amount of \$983.00.

- e. To pay for a home warranty in the approximate amount of \$0.00.
 - f. To pay estimated County Taxes in the approximate amount of \$552.85.
 - g. To pay estimated sewer/water in the approximate amount of \$0.00.
 - h. To pay estimated realtor fees in the approximate amount of \$7,320.00.
5. If this Motion is granted no creditor will be adversely effected. Debtor shall continue to make her plan payment until the completion of her bankruptcy.

WHEREFORE, debtor prays for an Order from the Court allowing the sale of the property of the estate.

Dated this 30th day of March, 2015.

/s/ Ryan E. Simpson
Ryan E. Simpson
Attorney for the Debtor

CERTIFICATE OF SERVICE

By Notice of Electronic Filing (CM/ECF)

I hereby certify that on the 30th day of March, 2015, I electronically filed the foregoing MOTION FOR COURT APPROVAL TO SELL PROPERTY OF THE ESTATE with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

United State Trustee USTPRegion19.SK.ECF@usdoj.gov

Kevin R. Anderson kanderson@ch13kra.com

Ryan E. Simpson ryan@bnkut.com

By U.S. Mail – Regular first class United States mail, postage full prepaid

I hereby certify that on the 30th day of March, 2015, caused to be served a truce and correct copy of the foregoing MOTION FOR COURT APPROVAL TO SELL PROPERTY OF THE ESTATE as follows:

Joseph & Sherrie Gubler
86 S. 400 W.
La Verkin, Utah 84745

Mail Service to Entire Matrix – By regular first class United States mail, postage fully pre-paid, addressed to all parties who did not receive electronic service as set forth herein listed on the Official Court Mailing Matrix dated the 30th day of March, 2015, attached hereto.

/s/ Ryan E. Simpson

Label Matrix for local noticing

1088-2

Case 15-21889

District of Utah

Salt Lake City

Mon Mar 30 10:47:55 MDT 2015

America First Credit U

Po Box 9199

Ogden, UT 84409-0199

American Express

PO Box 3001

Malvern, PA 19355-0701

Alan and Stella Olsen

205 S. 100 E.

La Verkin, UT 84745-5715

American Express

Po Box 3001

16 General Warren Blvd

Malvern, PA 19355-1245

Kevin R. Anderson tr
 405 South Main Street
 Suite 600
 Salt Lake City, UT 84111-3408

Bank of America
 Po Box 15168
 Wilmington, DE 19850

Beaconfunding
 28 Lord Rd
 Suite 230
 Marlborough, MA 01752-4576

Chartway Fcu
 Attn: Collections
 160 Newtown Rd
 Virginia Beach, VA 23462-2415

Chartway Federal Cu
 Attn: Collections
 160 Newtown Rd
 Virginia Beach, VA 23462-2415

(p) CITIBANK
 PO BOX 790034
 ST LOUIS MO 63179-0034

Cre8tive Stiches LLC
 146 N 300 W
 La Verkin, UT 84745-5413

(p) INTERNAL REVENUE SERVICE
 CENTRALIZED INSOLVENCY OPERATIONS
 PO BOX 7346
 PHILADELPHIA PA 19101-7346

Discover Bank
 Discover Products Inc
 PO Box 3025
 New Albany, OH 43054-3025

Discover Fin Svcs Llc
 Po Box 15316
 Wilmington, DE 19850-5316

Ditech.com/GMAC Mortgage
 Attn: Bankruptcy
 1100 Virginia Dr
 Fort Washington, PA 19034-3204

GECRB/Chevron
 Attention: Bankruptcy
 Po Box 103104
 Roswell, GA 30076-9104

GECRB/JC Penny
 Attention: Bankruptcy
 Po Box 103104
 Roswell, GA 30076-9104

GM Financial
 PO Box 78143
 Phoenix, AZ 85062-8143

Great Lakes
 2401 International Lane
 Madison, WI 53704-3192

Great Lakes Higher Education
 2401 International Lane
 Madison, WI 53704-3192

Green Tree Servicing L
 Po Box 6172
 Rapid City, SD 57709-6172

Joseph E Gubler
 86 S. 400 W.
 La Verkin, UT 84745-5424

Sherrie Gubler
 86 S. 400 W.
 La Verkin, UT 84745-5424

Hollyann Gubler
 86 N 400 W
 La Verkin, UT 84745

Hollyann Gubler
 86 S 400 N
 La Verkin, UT 84745

Hollyann Gubler
 86 S 400 W
 La Verkin, UT 84745-5424

Kohls/capone
 N56 W 17000 Ridgewood Dr
 Menomonee Falls, WI 53051-7096

Lane Bryant Retail/soa
 450 Winks Ln
 Bensalem, PA 19020-5932

(p) MOUNTAIN AMERICA CREDIT UNION
735 S STATE ST #300
SALT LAKE CITY UT 84111-3821

Ryan E. Simpson
8839 South Redwood Road
Suite C2
West Jordan, UT 84088-9288

South West Community Credit Union
162 North 400 East
A101
Saint George, UT 84770-7192

Southwest Community Credit Union
85 N 200 W
Hurricane, UT 84737-2076

Southwest Community Cu
85 N 200 W
Hurricane, UT 84737-2076

Troy Jolley
170 N 300 W
La Verkin, UT 84745-5413

United States Trustee
Ken Garff Bldg.
405 South Main Street
Suite 300
Salt Lake City, UT 84111-3402

Utah State Tax Commission
210 North 1950 West
Salt Lake City, UT 84134-9000

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Citibank Usa
Citicorp Credit Services/Attn:Centralize
Po Box 20507
Kansas City, MO 64195

Department of the Treasury
Internal Revenue Service
Ogden, UT 84201

Mountain America Cu
Po Box 9001
West Jordan, UT 84084

End of Label Matrix
Mailable recipients 37
Bypassed recipients 0
Total 37